

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: WATSON GRINDING & MANUFACTURING CO. Debtors	§ § § § § § §	Chapter 11 Case No. 20-30967 (MI)
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In re: WATSON VALVE SERVICES, INC. Debtor.	§ § § § § § §	Chapter 11 Case No. 20-30968 (MI)
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**JANUARY 24 CLAIMANTS COMMITTEE'S EMERGENCY
MOTION TO EXECUTE WAIVER LETTER**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS MOTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

PLEASE NOTE THAT ON MARCH 24, 2020, THROUGH THE ENTRY OF GENERAL ORDER 2020-10, THE COURT INVOKED THE PROTOCOL FOR EMERGENCY PUBLIC HEALTH OR SAFETY CONDITIONS.

IT IS ANTICIPATED THAT ALL PERSONS WILL APPEAR TELEPHONICALLY AND ALSO MAY APPEAR VIA VIDEO AT THIS HEARING. AUDIO COMMUNICATION

WILL BE BY USE OF THE COURT'S REGULAR DIAL-IN NUMBER. THE DIAL-IN NUMBER IS +1 (832) 917-1510. YOU WILL BE RESPONSIBLE FOR YOUR OWN LONG-DISTANCE CHARGES. YOU WILL BE ASKED TO KEY IN THE CONFERENCE ROOM NUMBER. JUDGE ISGUR'S CONFERENCE ROOM NUMBER IS 954554.

PARTIES MAY PARTICIPATE IN ELECTRONIC HEARINGS BY USE OF AN INTERNET CONNECTION. THE INTERNET SITE IS WWW.JOIN.ME. PERSONS CONNECTING BY MOBILE DEVICE WILL NEED TO DOWNLOAD THE FREE JOIN.ME MOTION.

ONCE CONNECTED TO WWW.JOIN.ME, A PARTICIPANT MUST SELECT "JOIN A MEETING". THE CODE FOR JOINING THIS HEARING BEFORE JUDGE ISGUR IS "judgeisgur". THE NEXT SCREEN WILL HAVE A PLACE FOR THE PARTICIPANT'S.

**To the Honorable Marvin Isgur,
United States Bankruptcy Judge:**

The Official Committee of January 24 Claimants (the "Committee") files this Emergency Motion to Approve Waiver Letter and in support thereof shows the Court as follows:

1. Genevieve Graham, an associate previously employed by counsel for the Committee, Porter Hedges LLP, seeks to continue her career at Jackson Walker, LLP.
2. Jackson Walker represents parties in this case, KMHJ, Ltd. and KMHJ Management Company, LLC (jointly, "KMHJ"). KMHJ is engaged in a contested matter with the Committee. Ms. Graham will not be involved in this case in any way going forward.
3. Jackson Walker, LLP and Porter Hedges LLP wish to enter into a letter agreement attached as Exhibit A (the "Waiver Letter"). The Waiver Letter conforms to the requirements proscribed by the Texas Rules of Professional Conduct to permit the associate to be employed by Jackson Walker, LLP and also allow Jackson Walker, LLP to continue to represent its client in this case.
4. This Motion is filed out of an abundance of caution and to seek approval of by the Court of the Waiver Letter, to the extent necessary.

5. Emergency relief is warranted to allow Ms. Graham to make an immediate transition in employment.

Dated: May 31, 2020.

Respectfully submitted,

PORTER HEDGES LLP

/s/ Joshua W. Wolfshohl

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COUNSEL FOR THE OFFICIAL COMMITTEE
OF JANUARY 24 CLAIMANTS

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was served via electronic transmission to all registered ECF users appearing in the case on May 31, 2020.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl